

FILED

FEB 26 2025
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S2-4:23-cr-00505 AGF/PLC
)	
MARCELLIS BLACKWELL,)	
)	
Defendant.)	

SECOND SUPERSEDING INDICTMENT

GENERAL ALLEGATIONS

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The North County Police Cooperative (“NCPC”) was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the NCPC was responsible for responding to and investigating crimes occurring in several municipalities that are located in North St. Louis County, Missouri;
3. Defendant MARCELLIS BLACKWELL was employed by the NCPC as a police officer;
4. Defendant MARCELLIS BLACKWELL was sworn to uphold the United States Constitution, as well as the laws of the State of Missouri.

COUNT ONE
[18 U.S.C. §§242 and 250(b)(4)(A)]

5. On or about November 8, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived N.S. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled N.S.'s genitals under N.S.'s clothing, without N.S.'s consent and without a legitimate government purpose, after N.S. was restrained. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWO
[18 U.S.C. §§242 and 250(b)(4)(A)]

6. On or about November 22, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.T. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled D.T.'s genitals under D.T.'s clothing, without D.T.'s consent and without a legitimate government purpose, after D.T. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type

prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT THREE
[18 U.S.C. §1519]

7. On or about November 22, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.T. and including a false statement in his written report of the arrest of D.T., specifically that his department-issued body camera was active and recorded the entirety of the call.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT FOUR
[18 U.S.C. §§242 and 250(b)(4)(A)]

8. On or about November 26, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived K.W. of his right to bodily integrity, a right

secured and protected by the Constitution and laws of the United States, when he fondled K.W.'s genitals under K.W.'s clothing, without K.W.'s consent and without a legitimate government purpose, after K.W. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT FIVE
[18 U.S.C. §1519]

9. On or about November 26, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with K.W. and including a false statement in his written report of the arrest of K.W., specifically that his department-issued body camera was active and recorded the entirety of the call.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT SIX
[18 U.S.C. §§242 and 250(b)(1) and 250(b)(4)(A)]

10. On or about December 21, 2022, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived R.M. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled R.M.'s genitals under his clothing and penetrated R.M.'s anus with his finger without R.M.'s consent and without a legitimate government purpose, after R.M. was arrested and restrained. The defendant's conduct included kidnapping and aggravated sexual abuse. In the course of committing the offense, the defendant engaged in sexual misconduct involving aggravated sexual abuse and of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(1).

COUNT SEVEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

11. On or about March 20, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived T.D. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled T.D.'s genitals under T.D.'s clothing, without T.D.'s consent and without a legitimate government purpose, after T.D. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type

prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT EIGHT
[18 U.S.C. §1519]

12. On or about March 20, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with T.D. and including a false statement in his written report of the arrest of T.D., specifically that during this incident, his department-issued body camera was active and recording.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT NINE
[18 U.S.C. §§242 and 250(b)(4)(A)]

13. On or about March 27, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived V.W. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled V.W.'s genitals under V.W.'s clothing, without V.W.'s consent and without a legitimate government

purpose, after V.W. was detained. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TEN
[18 U.S.C. §1519]

14. On or about April 10, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with C.W. and including a false statement in his written report of the arrest of C.W., specifically that his department-issued axon body camera was active during this event.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT ELEVEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

15. On or about April 15, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.P. of his right to bodily integrity, a right

secured and protected by the Constitution and laws of the United States, when he fondled D.P.'s genitals under D.P.'s clothing, without D.P.'s consent and without a legitimate government purpose, after D.P. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWELVE
[18 U.S.C. §1519]

16. On or about April 15, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**, acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.P. and including a false statement in his written report of the arrest of D.P., specifically that his AXON body camera was recording during this entire incident.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT THIRTEEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

17. On or about April 19, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**,

while acting under color of law, willfully deprived C.P. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled C.P.'s genitals under C.P.'s clothing, without C.P.'s consent and without a legitimate government purpose, after C.P. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT FOURTEEN
[18 U.S.C. §1519]

18. On or about April 19, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with C.P. and including a false statement in his written report of the arrest of C.P., specifically that his department-issued body camera was active and recorded the entirety of the call.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT FIFTEEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

19. On or about April 25, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived T.J. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled T.J.'s genitals under T.J.'s clothing, without T.J.'s consent and without a legitimate government purpose, after T.J. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT SIXTEEN
[18 U.S.C. §1519]

20. On or about April 25, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with T.J. and including a false statement in his written report of the arrest of T.J., specifically that his department-issued axon body camera was active during this

event.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT SEVENTEEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

21. On or about April 26, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.A. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled D.A.'s genitals under D.A.'s clothing, without D.A.'s consent and without a legitimate government purpose, after D.A. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT EIGHTEEN
[18 U.S.C. §§242 and 250(b)(4)(A)]

22. On or about April 27, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.W.3 of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled D.W.3's genitals under D.W.3's clothing, without D.W.3's consent and without a legitimate government purpose, after D.W.3 was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type

prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT NINETEEN
[18 U.S.C. §1519]

23. On or about April 27, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.W.3 including a false statement in his written report of the arrest of D.W.3, specifically that his department-issued body camera was active and recorded the entirety of the incident.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWENTY
[18 U.S.C. §§242 and 250(b)(4)(A)]

24. On or about May 14, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived J.R. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled J.R.'s genitals under J.R.'s clothing, without J.R.'s consent and without a legitimate government purpose,

after J.R. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWENTY-ONE
[18 U.S.C. §1519]

25. On or about May 14, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with J.R. and including a false statement in his written report of the arrest of J.R., specifically that his AXON body camera was recording during this entire incident.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWENTY-TWO
[18 U.S.C. §§242 and 250(b)(4)(A)]

26. On or about May 26, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.J. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled J.R.'s

genitals under D.J.'s clothing, without D.J.'s consent and without a legitimate government purpose, after D.J. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWENTY-THREE
[18 U.S.C. §1519]

27. On or about May 26, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**, acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.J. and including a false statement in his written report of the arrest of D.J., specifically that his department-issued body camera was active and recorded the entirety of the call.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWENTY-FOUR
[18 U.S.C. §§242 and 250(b)(4)(A)]

28. On or about May 30, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**,

while acting under color of law, willfully deprived K.R. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled K.R.'s genitals under K.R.'s clothing, without K.R.'s consent and without a legitimate government purpose, after K.R. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWENTY-FIVE
[18 U.S.C. §1519]

29. On or about May 30, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with K.R. and including a false statement in his written report of the arrest of K.R., specifically that throughout this investigation, his department-issued Axon body-worn camera was activated and recording.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWENTY-SIX
[18 U.S.C. §§242 and 250(b)(4)(A)]

30. On or about May 30, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived A.S. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled A.S.'s genitals under A.S.'s clothing, without A.S.'s consent and without a legitimate government purpose, while A.S. was detained and restrained. The defendant's conduct resulted in bodily injury to A.S. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWENTY-SEVEN
[18 U.S.C. §1519]

31. On or about May 30, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with A.S. and including a false statement in his written report of the arrest of A.S., specifically that throughout this investigation, his department-issued Axon body-

worn camera was activated and recording.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWENTY-EIGHT
[18 U.S.C. §§242 and 250(b)(4)(A)]

32. On or about June 3, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived M.A. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled M.A.'s genitals under M.A.'s clothing, without M.A.'s consent and without a legitimate government purpose, after M.A. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT TWENTY-NINE
[18 U.S.C. §1519]

33. On or about June 3, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before

concluding his interaction with M.A. and including a false statement in his written report of the arrest of M.A., specifically that his department-issued body camera was active and recorded the entirety of the incident.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT THIRTY
[18 U.S.C. §§242 and 250(b)(4)(A)]

34. On or about June 3, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.W.1 of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled D.W.1's genitals under D.W.1's clothing, without D.W.1's consent and without a legitimate government purpose, after D.W.1 was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT THIRTY-ONE
[18 U.S.C. §1519]

35. On or about June 3, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper

administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.W.1 and including false statements in his written report of the arrest of D.W.1, specifically that he located a firearm in the middle consoule [sic] and that during this incident his department-issued body camera was active and recording.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT THIRTY-TWO
[18 U.S.C. §§242 and 250(b)(4)(A)]

36. On or about June 4, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**, while acting under color of law, willfully deprived W.P. of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled W.P.'s genitals under W.P.'s clothing, without W.P.'s consent and without a legitimate government purpose, after W.P. was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT THIRTY-THREE
[18 U.S.C. §1519]

37. On or about June 4, 2023, within the Eastern District of Missouri, the defendant, **MARCELLIS BLACKWELL**, acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau

of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with W.P. and including a false statement in his written report of the arrest of W.P., specifically that his AXON body camera was recording during this entire incident.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT THIRTY-FOUR
[18 U.S.C. §§242 and 250(b)(4)(A)]

38. On or about June 5, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

while acting under color of law, willfully deprived D.W.2 of his right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, when he fondled D.W.2's genitals under D.W.2's clothing, without D.W.2's consent and without a legitimate government purpose, after D.W.2 was arrested and restrained. The defendant's conduct included kidnapping. In the course of committing the offense, the defendant engaged in sexual misconduct of the type prohibited by subsection (b) of Title 18, United States Code, Section 2244.

In violation of and punishable under Title 18, United States Code, Sections 242 and 250(b)(4)(A).

COUNT THIRTY-FIVE
[18 U.S.C. §1519]

39. On or about June 5, 2023, within the Eastern District of Missouri, the defendant,

MARCELLIS BLACKWELL,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly altered, concealed, covered up, and falsified a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant knowingly altered, concealed, covered up, and falsified a NCPC record by turning off his department-issued body worn camera before concluding his interaction with D.W.2.

In violation of and punishable under Title 18, United States Code, Section 1519.

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

CHRISTINE H. KRUG #42586MO
Assistant United States Attorney